

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

B. B., a minor, by and through his mother and next friend, OWENA KNOWLES,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No.: 3:06-cv-00715-MHT
)	
PAWN CITY, INC., INTERSTATE ARMS CORP., and NORINCO a/k/a CHINA NORTH INDUSTRIES CORP., et al.,)	
)	
)	
Defendants.)	

**RESPONSE OF CHINA NORTH INDUSTRIES CORP. TO
SHOW CAUSE ORDER DATED FEBRUARY 20, 2007**

Comes now defendant China North Industries Corp. (“Norinco”) and responds to the Court’s Order to show cause why Plaintiff’s Motion to Compel Defendant Norinco’s Discovery Responses Within Fourteen (14) Days should not be granted.

Today, February 28, 2007, Norinco served its Responses to Plaintiff’s First Interrogatories (attached hereto as Exhibit “A”) and its Responses to Plaintiff’s First Requests for Production (attached hereto as Exhibit “B”). Norinco apologizes for its delay in responding to Plaintiff’s discovery. The delay was solely because of communication problems between Norinco and its counsel. Norinco believes this case to be eminently defensible and wishes to assure the Court and the other parties that Norinco was not seeking to delay these proceedings or to avoid responding to Plaintiff’s discovery requests.

WHEREFORE, defendant Norinco respectfully submits that Plaintiff's Motion to Compel Defendant Norinco's Discovery Responses Within Fourteen (14) Days is due to be denied as moot.

s/ James C. Barton, Jr.

James C. Barton, Jr. (BAR014)

Bar Number: ASB-0237-B51J

Email: jbartonjr@jbpp.com

s/ Alan D. Mathis

Alan D. Mathis (MAT052)

Bar Number: ASB-8922-A59M

Email: adm@jbpp.com

Attorneys for defendant

China North Industries Corp. a/k/a Norinco

JOHNSTON BARTON PROCTOR & ROSE LLP

2900 AmSouth/Harbert Plaza

1901 Sixth Avenue North

Birmingham, Alabama 35203

Telephone: (205) 458-9400

Facsimile: (205) 458-9500

OF COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the above and foregoing with the Clerk of the Court on February 28, 2007, using the CM/ECF system, which will send notification of such filing to the following:

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s/ Alan D. Mathis
Of Counsel

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

B.B., a minor, by and)
Through his mother and next friend,)
OWENA KNOWLES,)
Plaintiff,)
v.) Case No.: 3:06-cv-00715-MHT
PAWN CITY, INC., INTERSTATE)
ARMS CORP., and NORINCO a/k/a)
CHINA NORTH INDUSTRIES CORP.,)
et al.,)
Defendants.)

**DEFENDANT CHINA NORTH INDUSTRIES CORP.'S
RESPONSES TO PLAINTIFF'S FIRST INTERROGATORIES TO NORINCO**

Defendant China North Industries Corp. ("Norinco"), by and through its counsel, Johnston Barton Proctor & Rose LLP, and pursuant to Rule 33 of the Federal Rules of Civil Procedure, hereby submits its response to Plaintiff's First Interrogatories to Norinco, as follows:

Responses to Interrogatories

1. Please state this defendant's name correctly and/or the correct way this defendant should be designated as a party defendant in an action at law (at the time of the occurrence made the basis of this suit and at the time these interrogatories are answered).

Response

Defendant's legal name is China North Industries Corp. Defendant is commonly known as Norinco.

2. State this defendant's role in the design, manufacture, assembly, and/or distributive chain of the product. If this defendant claims to have had no such role, state the name and address of each person or entity that did. If this defendant had such role, state:
 - (a) The respective dates the product was designed, assembled, and/or manufactured and/or distributed.
 - (b) The date the product was sold and the name and address of the person or entity to whom the product was sold.

Response

Norinco purchased the product from the manufacturer, Qiqihar Hawk Industries, which sold it to Norinco on July 29, 1999. In turn, Norinco sold the product to Interstate Arms Corp. in November 1999. Norinco does not have first hand knowledge of the information requested about the other steps in the chain of distribution.

3. State the name and address of each person or entity within the distributive chain of the product from the date of manufacture up to and including the date of said occurrence.

Response

Please see the response to Interrogatory 2.

4. Please identify all information which accompanies the product from the time it is shipped from this defendant to the time it is purchased by a consumer.

Response

The HP Series Pump Action Shotguns Owners Manual ("Manual) and the quality certificate issued by the manufacturer accompanied the product when it was shipped by Norinco to Interstate Arms Corp. Norinco does not have first hand knowledge as to what information accompanied the product in later steps of the chain of distribution.

5. Please identify all parts and accessories that accompany the product from the time it is shipped from this defendant to the time it is purchased by a consumer.

Response

Four chokes and one spanner accompanied the product when it was shipped by Norinco to Interstate Arms Corp. Norinco does not have first hand knowledge as to what accessories accompanied the product in later steps of the chain of distribution.

6. Please list all testing and/or quality assurance procedures ever performed on the product by this defendant or on behalf of this defendant.

Response

Norinco did not perform testing or quality assurance procedures on this product.

7. List any and all standards, if any, which pertain to the design, manufacture, use or assembly of the product or other similar products including, but not limited to, all standards known to the defendant which were promulgated by local, state or governmental agencies, bureaus, and commissions, or by industry groups.

Response

Norinco objects that the phrase "similar products" is not defined. To Norinco's knowledge, the product is manufactured or assembled according to the GB14630-93, WJ1675-86 and WJ1770-88 standards used in the People's Republic of China.

8. Describe any and all recall and/or retrofit campaigns or similar activity involving the product or similar products, or any component thereof conducted by this defendant or any representative of this defendant.

Response

Norinco objects that the phrase "similar products" is not defined. To Norinco's knowledge, there have been no recall and/or retrofit campaigns or similar activity involving shotguns distributed by Norinco.

9. List all warranties pertaining to or covering the product. (If written, please attach copies).

Response

Norinco did not make any express warranties covering this product.

10. Describe any and all approvals of the product by any person, corporation, association, consumer group, or any other entity.

Response

Norinco objects that this interrogatory is vague in that the word "approvals" is unclear. Norinco did not receive any express approvals for this product.

11. Describe any training, teaching or instructional program (s) conducted by or participated in by this defendant regarding the use, operation and/or, maintenance of the product or similar products. This should include, but is not limited to, any field training, teaching or instructional programs.

Response

Norinco objects that the phrase "similar products" is not defined. Norinco has not conducted or participated in training, teaching or instructional programs for this product. Instruction concerning the use of this product is given in the Manual accompanying the product when it is sold by Norinco.

12. Describe any and all repairs, changes or modifications to the product made five years prior to or subsequent to the occurrence made the basis of this suit.

Response

To Norinco's knowledge, none.

13. State the full name and address of each and every witness that you expect to call at the trial of this case;

Response

Norinco has not yet identified the witnesses it expects to call at the trial of this case. Norinco will provide such information in accordance with Section 10 of the Uniform Scheduling Order in this case.

14. Please state the name and address of each expert witness that you expect to call at the trial of this case and state the subject matter on which said experts are expected to testify.

Response

Norinco has not yet identified the expert witnesses it expects to call at the trial of this case. Norinco will provide such information in accordance with Section 8 of the Uniform Scheduling Order in this case.

15. Please state the substance of the facts, opinions and conclusions to which each and every expert is expected to testify in this case.

Response

Please see the response to Interrogatory 14.

16. State the name and address of the person(s) and/or employee(s) of this defendant who is most knowledgeable about the design, manufacture and/or operation of the product.

Response

Norinco did not design or manufacture the product. As to the operation of the product:

Mr. Chai Da Wei
Sales Manager of Import & Export Department
Norinco Equipment Co., Ltd.
c/o Johnston Barton Proctor & Rose LLP
2900 AmSouth/Harbert Plaza
1901 Sixth Ave. N.
Birmingham, AL 35203

17. State the name and address of any and all safety or industrial associations or organizations of which this defendant is a member.

Response

None relating to this product.

18. State whether or not this defendant has or had possession or control of any document containing information regarding safety in the design, manufacture, assembly, use and/or maintenance of the product described in the complaint or other substantially similar products. If so, produce a copy thereof.

Response

The Manual accompanied the product when it was sold by Norinco. The Manual has previously been produced.

19. Please state and list any citations, criticisms, reprimands or correspondence with any governmental agency or body because of alleged violations of any international, federal, state, or local statute or regulation with regard to the design, manufacture, distribution or sale of the product described in the complaint within the last five years. Produce a copy of all documentation described in this interrogatory.

Response

Norinco objects that this interrogatory is vague. Norinco understands this interrogatory to be directed to citations, criticisms, reprimands or correspondence with any government agency or body directed particularly to shotguns. Based on this understanding, there were none, to Norinco's knowledge.

20. Please state or list any and all lawsuits (past or present) against this defendant claiming injury, death or damage due to an alleged defective condition, defect in or problems regarding the product or similar products described in the complaint within the last five years. This should include the civil action number of any such lawsuits, location of filing, current disposition, and identity of plaintiff and defense counsel.

Response

Norinco objects that the term "similar products" in this interrogatory is vague. With the exception of this lawsuit, there is no other lawsuit against Norinco claiming injury, death or damage due to an alleged defective condition, defect in or problems regarding shotguns within the last five years.

21. Please describe any remedial or subsequent changes made to the product described in the complaint

Response

To Norinco's knowledge, none.

22. Please describe any safety inspection, quality control inspection, quality inspection or other type of inspection, made by or for this defendant with respect to the manufacturing and/or distribution of the product or products similar to the one made the basis of plaintiff's complaint

Response

Norinco objects that the phrase "similar products" is not defined. Norinco is not a manufacturer of the product or other shotguns and it did not conduct any inspections with regard to such products. In accordance with the sales contracts between Norinco and the manufacturer, the manufacturer is responsible for the quality of the products shipped under the sales contracts.

23. Please describe the procedure this defendant follows when someone reports a problem or criticism of equipment such as the product that is the subject of this lawsuit.

Response

There have not been any problems or criticisms with respect to the product that is the subject of this lawsuit. When there is a report or criticism of products shipped by Norinco, Norinco conducts its own investigation to learn the nature of the problem or criticism and then figures out the solution depending on the nature of the problem or criticism.

24. State whether or not this defendant, or anyone to its knowledge, published and/or distributed any brochure, pamphlet, or other printed material which contained warnings concerning the possibility of injury resulting from the use of the product referred to in the complaint, or other similar products. If so, produce a copy thereof.

Response

The Manual accompanied the product when it was sold by Norinco. It provides warnings concerning the possibility of injury resulting from the use of the product. The Manual has previously been produced.

25. State whether or not this defendant has ever sent any notices, warnings, or modified instructions to owners or users of products manufactured and/or, sold by this defendant. If so, produce a copy thereof.

Response

Norinco objects that this interrogatory is vague and overbroad since it does not define products. Norinco sells many different types of products. Norinco has not sent any notices, warnings or modified instructions to owners of shotguns sold by Norinco other than the Manual.

26. State whether this defendant or any representative of this defendant conducted any recall and/or retrofit campaigns or similar activity involving the product referred to in the complaint or similar products, or any component part thereof. If so, produce a copy thereof.

Response

Norinco objects that this interrogatory does not define "similar products." Norinco has not conducted any recall and/or retrofit campaigns or similar activity involving shotguns.

27. Has this defendant ever made any written warranties on any of the products which it distributes? If so, produce a copy thereof.

Response

Norinco objects that the phrase "any of the products which it distributes" is vague and overbroad. Norinco distributes many different types of products. Norinco did not make a written warranty on the product.

28. State whether this defendant conducted, participated in or otherwise knows of any training or instructional program regarding the use, operation and/or maintenance of the product involved in the occurrence made the basis of this suit or substantially similar products. If so, produce a copy thereof

Response

Please see the response to Interrogatory 11.

29. Identify any and all safety components of this product. Such an identification should include a description of all guards, warnings, safety systems and designs.

Response

The product has a push button safety which moves only horizontally and has a red band on one side. It has an automatic disconnector device which means that the trigger must be released between rounds. It has a bolt release lever which allows the user to empty the chamber of the product in the event the user chooses not to shoot. The Manual, which accompanied the product when it was sold by Norinco, provides information about safe use of the product.

30. Describe this defendant's relationship with Qiqihar Hawk Industries and

Interstate Arms Corporation.

Response

Norinco purchased the product from Qiqihar Hawk Industries and sold it to Interstate Arms Corp.

31. Describe with specificity the process through which the barrel is affixed in its proper location on the subject product.

Response

Norinco objects that this interrogatory is ambiguous. To the extent the interrogatory is directed to the manufacturing process, Norinco did not manufacture the product. To the extent the interrogatory is directed to assembly of the product by the user, please see page 3 of the Manual, which has been produced.

32. List and describe all equipment used in the manufacture of the product, to include soldering equipment and supplies.

Response

Norinco did not manufacture the product.

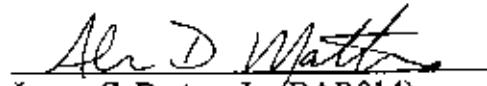
33. Describe in detail the training given to the person(s) responsible for soldering the barrel stud and affixing the barrel to the product.

Response

Norinco did not manufacture the product.

Signed as to objections only:

Dated: February 28, 2007.


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OF COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by first class mail, postage prepaid, on this 28th day of February 2007, upon the following:

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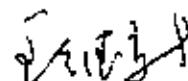
Curt M. Johnson, Esq.
JOHNSON CALDWELL & MCCOY
117 N. Lanier Avenue, Suite 201
Lanett, Alabama 36863

Aldo Mather
Of Counsel

VERIFICATION

I am Wang Wenxin of Defendant China North Industries Corp. I have read the foregoing Defendant's Responses to Plaintiff's First Set of Interrogatories and know its contents. I declare under the penalty of perjury of the laws of the United States that the Responses are true and correct to the best of my information and belief, which is based on my own personal knowledge, the documents in the possession of Defendant and its subsidiaries, and the knowledge of other officers and employees of Defendant and its subsidiaries.

Executed this 27 day of February, 2007 in Beijing, People's Republic of China.



UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

B.B., a minor, by and)
Through his mother and next friend,)
OWENA KNOWLES,)
Plaintiff,)
v.) Case No.: 3:06-cv-00715-MHT
PAWN CITY, INC., INTERSTATE)
ARMS CORP., and NORINCO a/k/a)
CHINA NORTH INDUSTRIES CORP.,)
et al.,)
Defendants.)

**DEFENDANT CHINA NORTH INDUSTRIES CORP.'S RESPONSES TO
PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION TO NORINCO**

Defendant China North Industries Corp. ("Norinco"), by and through its counsel, Johnston Barton Proctor & Rose LLP, and pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby submits its response to Plaintiff's First Requests for Production to Norinco, as follows:

Responses to Document Requests

1. Please produce all information which accompanies the product from the time it is shipped from this defendant to the time it is purchased by a consumer.

Response

The HP Series Pump Action Shotgun Owners Manual ("Manual") accompanied the product when it was sold by Norinco. The Manual has been produced. Norinco does

not have any other information responsive to this Request, including the quality certificate issued by the manufacturer.

2. Please produce all warnings and instructions that accompany the product from the time it is shipped from this defendant to the time it is purchased by a consumer.

Response

Please see the response to Request 1.

3. Please produce all parts and accessories that accompany the product from the time it is shipped from this defendant to the time it is purchased by a consumer.

Response

Norinco is not a manufacturer of the product. Norinco does not have the accessories that accompany the product from the time it is shipped from Norinco.

4. Please produce all testing data and results concerning the product conducted with the last five years.

Response

Norinco does not have any such testing data and results.

5. Please produce a copy of all patents referable to the product or any component of same.

Response

Norinco is not aware of any patents relating to the product or any of its components.

6. Please produce a copy of all patents referable to any component of the product.

Response

Please see the response to Request 6.

7. Please produce a copy of all advertising material pertaining to the subject product manufactured by this defendant

Response

Norinco did not manufacture this product. Norinco does not have any advertising material pertaining to the product.

8. Please produce an exemplar product.

Response

Norinco is unable to produce an exemplar product.

9. Pursuant to ARCP 26 (b) (2) and *Ex-parte Badham*, please produce any insurance agreements (primary, excess, or other) including any declaration pages, under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment

Response

Norinco has no insurance agreement relevant to this action.

10. Please produce copies of all claims and/or complaints in which this defendant was sought to be held responsible for personal injury or death as a result of the use, manufacture, design, and/or breach of warranty of or relating to any product

manufactured or assembled by this defendant at any time in the five (5) years prior to the date of the occurrence made the basis of this litigation.

Response

Norinco objects that the term "any products" in this Request is vague and overbroad. Norinco is not a manufacturer of the shotgun. There are no claims and/or complaints in which Norinco was sought to be held responsible for personal injury or death as a result of the use, manufacture, design, and/or breach of warranty of or relating to shotguns shipped by Norinco at any time in the five (5) years prior to the date of the occurrence made the basis of this litigation.

11. Please produce any and all resumes or similar documents setting forth the educational background and qualifications of each and every expert witness that you expect to testify at the trial of this case.

Response

Norinco has not yet identified any expert witnesses it expects will testify at the trial of this case. Norinco will provide resumes of any such expert witness in accordance with Section 8 of the Uniform Scheduling Order entered in this case.

12. Please produce any written report obtained from any expert witness this defendant has consulted with whether or not they will be used at trial.

Response

Please see the response to Request 11.

13. Please produce any and all documents of any type whatsoever including, but not limited to invoices, sales orders, or written documents of any type indicating, addressing or following out of any remedial or subsequent changes made to the product described in the complaint within the last five years.

Response

Norinco does not have any such documents.

14. Please produce any and all contracts, including any addendum thereto, between this defendant and any other entity, relating to the procurement, manufacture, and/or design of the product described in the complaint

Response

Norinco has identified and produced such documents in its Initial Disclosures dated October 20, 2006.

15. Please produce the owner's manual for the product involved in this case.

Response

The Manual has been produced.

16. Please produce any and all plans, blueprints, drawings, specifications, records, reports, memoranda, and other written or recorded documents relating to the design, manufacture or assembly of the product referred to in the complaint.

Response

Norinco is not the manufacturer of the product and does not have any documents responsive to this request.

17. Please produce any and all notes, memorandum, items of correspondence, drawings, pictures or other documents regarding any safety inspection, quality control inspection, quality inspection or other type of inspection, made by or for this defendant at or about the time the product, or products similar to the one made the basis of plaintiff's complaint, was manufactured, assembled or distributed.

Response

Norinco objects that the phrase "products similar to the one" is not defined. Norinco is not a manufacturer of the product. It does not have the notes, memorandum, items of correspondence, drawings, pictures or other documents regarding any safety inspection, quality control inspection, quality inspection or other type of inspection, with respect to shotguns. In accordance with the sales contracts between Norinco and the manufacturer, the manufacturer is responsible for the quality of the products shipped under the sales contracts.

18. Please produce each and every document, note, memorandum, item of correspondence or other document relating to any recommendations made by any entity or person, whether they be an agent of this defendant or not, regarding any quality control aspects of this defendants' manufacturing, assembly or distribution procedure for this product or products similar to the one made the basis of plaintiff's complaint.

Response

Norinco is not the manufacturer of the product. It does not have any such document, note, memorandum, item of correspondence or other document responsive to this Request.

19. Please produce any and all reports which were done as a result of either the accident which forms the basis of this suit or any prior accident involving the subject product or a substantially similar product within the last five years.

Response

Norinco objects that the phrase "substantially similar product" is not defined. Norinco does not have any report of either the accident which forms the basis of this suit or any prior accident involving shotguns within the last five years.

20. Please produce any and all policy and/or procedure manuals or any written information related to the procedure this defendant follows when someone reports a problem or criticism of equipment such as the product that is the subject of this lawsuit

Response

Norinco does not have such documents.

21. Please produce any and all documents evidencing reports or complaints of any problems with the subject product made by any person whether such report was made in writing or verbally, and whether or not any injury was involved within the last five years.

Response

Norinco does not have any reports or complaints of any problems with the subject product.

22. Please produce any and all policy, procedure and/or instruction manuals describing any safety inspection, quality control inspection, quality inspection or other type of inspection that this defendant had in effect with respect to the manufacturing, assembly or distribution of the product purchased by the Plaintiff and/or products similar to the one made the basis of plaintiff's complaint

Response

Norinco objects that the phrase "products similar to the one" is not defined. Norinco does not manufacture shotguns. Norinco does not have any documents responsive to the request relating to shotguns.

23. Produce all engineering change requests or change orders applicable to the product described in the complaint. Please produce all documents that reflect such changes.

Response

Norinco is not aware of and does not have any such engineering change requests or change orders.

24. Produce any and all invoices, bills of lading, charges, pick-up orders or order forms, or written documents of any type growing out of or pertaining to the sale of the product described in the complaint. This should include any and all documents growing out of or pertaining to the distributive chain of the product involved.

Response

Norinco has identified and produced such documents in its Initial Disclosures dated October 20, 2006.

25. Produce all standards which pertain to the design, manufacture, use or assembly of the product described in the complaint or other similar products including, but not limited to, all standards known to the defendant which were promulgated by local, state, international or governmental agencies, bureaus and commissions, or by industry groups.

Response

The Manual has been produced. Norinco objects that "similar products" is not defined. Norinco does not manufacture shotguns. To Norinco's knowledge, the product was manufactured in accordance with the standards of GB14630-93, WJ 1675-86 and WJ1770-88, which are used in the People's Republic of China. Norinco will produce these standards..

26. Produce all warnings or directions which were placed on the product described in the complaint.

Response

Norinco objects to this request as vague, since any warning or directions placed on the product could not be produced separately from the product. Warning and directions for the product were contained in the Manual, which was produced.

27. Produce any and all contracts, including any addendum thereto, between this defendant and any entity in the distributive chain relating to the procurement, manufacture, and/or design of the product involved.

Response

Please see the response to Request 24.

28. Produce any document containing information regarding whether or not the product described in the complaint is presently in the same or substantially the same condition:

- a) at the time of and immediately prior to the occurrence made the basis of this complaint; and
- b) at the time said product left this defendant's possession.

Response

Norinco does not have any documents responsive to this request.

29. Produce any documents evidencing reports or complaints of any problems with the subject product made by any person and whether such report was made in writing or verbally, and whether or not any injury was involved within the last five years.

Response

Norinco objects that Request 29 duplicates Request 21.

30. Produce any approvals issued of the product has from any person, corporation, association, consumer group, or any other entity. Please include the following:
- a) The name and address of the person, corporation, organization, association, group or other entity which issued the approval;
 - b) The date the approval was issued;
 - c) The products manufactured, assembled or distributed by this defendant which were included in the approval; and
 - d) The certificates of approval.

Response

Norinco objects that this Request is unintelligible. Norinco also objects that the phrase "approvals issued of the product" is vague.

31. Produce any test or test studies from any laboratory, consultant, engineer, person, firm or corporation, by whatever name called, who conducted any test or test study to determine the safety of the product referred to in the complaint or similar products at any time prior to the occasion made the basis of this suit within the last five years.

Response

Norinco objects that the phrase "similar products" is not defined. Norinco does not have any tests or test studies with respect to shotguns that are responsive to the request.

32. Produce any and all advertisements, marketing materials or promotions

concerning the product referred to in plaintiffs complaint or similar products whether said advertising was conducted by way of magazine, newspaper, television program other media form.

Response

Norinco objects that the phrase "similar products" is not defined. Norinco does not have any documents for shotguns that are responsive to this request.

33. Produce any and all communications this defendant sent to or received from Qiqihar Hawk Industries or Interstate Arms Corporation.

Response

Norinco objects that this request is overly broad in that it seeks "any and all communications." Norinco has identified and produced such documents related to the product in its Initial Disclosures dated October 20, 2006.

34. Produce all training manuals, video recordings, audio recordings, or other materials used in the training of employees in the manufacturing, assembly or distribution process of the product.

Response

Norinco does not have any such materials responsive to this Request.

35. Produce all video recordings and photographs which depict the manufacturing, assembly or distribution process used in manufacture, assembly or distribution of the subject product or other like products.

Response

Norinco objects that the phrase "like products" is not defined. Norinco does not have any such materials for shotguns that are responsive to this Request.

36. Produce the name, address and telephone number of all current employees.

Response

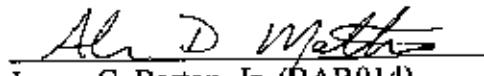
Norinco objects to this Request on the ground it seeks irrelevant information and is unduly burdensome. Norinco is a corporation with thousands of employees and a wide variety of products and services.

37. Produce the name, last known address and telephone number of all former employees since January 1, 1997, who were, at the time of employment with you, involved in the manufacture, assembly or distribution of firearms.

Response

Norinco objects to this Request on the ground it seeks irrelevant information and is unduly burdensome. Norinco is a corporation with thousands of employees. It has sold a wide variety of firearms in addition to the product.

Dated: February 28, 2007.



James C. Barton, Jr. (BAR014)
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Alan D. Mathis (MAT052)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by first class mail, postage prepaid, on this 28th day of February 2007, upon the following:

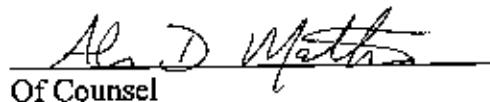
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